

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
MOISD Consortium)	CC Docket No. 02-6
)	
Request for Review of Decision by the)	Funding Request Nos:
Administrator of Universal Service)	1699033494, 1699033501
Administrative Company)	
)	Form 471 Application No.
)	161018359

RESPONSE TO REQUEST FOR REVIEW

Pursuant to section 54.721(d) of the Commission’s rules,¹ Charter Communications, Inc. (“Charter”) responds to the above-captioned request by MOISD Consortium (the “Consortium”) that the Commission review the decision of the Universal Service Administrative Company (“USAC”) denying the Consortium’s appeal of a Commitment Adjustment Letter (“COMAD”) rescinding funding under the Schools and Libraries universal service program (“E-rate”) for Funding Year 2016.² Charter (SPIN 143005817) and its affiliate, Charter Fiberlink CC VIII, LLC (SPIN 143033155), were the providers of the services at issue in the COMAD. Charter submits this response to clarify certain underlying facts and to request that the Commission direct USAC to take action to rectify the administrative errors underlying the Consortium’s Request. To the extent necessary, Charter respectfully requests that the Commission grant waivers to allow any required invoice filings after the expiration of the deadline for such filings for the 2016 Funding Year.

¹ 47 C.F.R. §§ 54.721(d).

² See MOISD Consortium, Request for Review, CC Docket No. 02-6, Funding Request Nos: 1699033494, 1699033501; Form 471 Application No. 161018359 (filed Aug. 21, 2018) (“Request”).

DISCUSSION

I. THE ISSUANCE OF FUNDING UNDER CANCELED FRNS RESULTED PRIMARILY FROM USAC’S FAILURE TO PROVIDE PROPER OVERSIGHT AND GUIDANCE

In the Request, the Consortium explains that USAC has sought repayment of disbursed funds from the Consortium in connection with funding sought under Funding Request Numbers (“FRNs”) that the Consortium had indicated should be canceled (FRNs 1699033494, 1699033501; Form 471 No. 161018359). The Consortium asserts that it canceled the funding requests and filed revised funding requests (FRNs 1699079036, 1699079047; Form 471 No. 161037183) due to “incorrect contracts”³ between the Consortium and Charter. The Consortium claims that Charter “caused this problem in the first place” by erroneously submitting invoices associated with the canceled FRN numbers.⁴ The Consortium’s efforts to blame Charter for the events that led to USAC’s COMAD are misplaced. Indeed, the Consortium overlooks its own contribution to the administrative errors that occurred and, even more importantly, USAC’s responsibility for approving funding tied to canceled FRNs and USAC’s subsequent failure to correct that error.

As an initial matter, there is plainly no basis for the Consortium’s characterizations of Charter’s actions as “rule violations.”⁵ This is a simple case of misunderstandings and administrative errors occasioned by the Consortium’s cancellation of its initial FRNs and substitution of new ones without clear communication of that change. In particular, Charter submitted invoices based on the FRNs that the Consortium initially provided. The Consortium subsequently canceled the initial FRNs and submitted new ones, but that change did not result in Charter’s issuance of replacement

³ *Id.* at 2.

⁴ *Id.* at 3.

⁵ *Id.* at 8.

invoices (identifying the new FRNs) based on several factors, including (i) a vague email response from the Consortium's E-rate consultant that lacked context about the canceled FRNs,⁶ (ii) inconsistent information in USAC's databases regarding the status of the funding requests at issue, and (iii) significant delays, inaction, and unresponsiveness by USAC staff when Charter later sought to address the issuance of new FRNs.

Despite acknowledging that the Consortium had canceled the original FRNs, USAC approved funding for all four FRNs—*i.e.*, both the canceled FRNs (1699033494 and 1699033501), and the replacement FRNs (1699079036 and 1699079047). Indeed, the status of the canceled FRNs was active at the time Charter submitted invoices to seek funding under the SPI method, and, as of this filing, the canceled FRNs still appear in the USAC's status tool as "Funded."⁷ Although there are notes at the very end of the record regarding the cancellation of FRNs 1699033494 and 1699033501, it appears that both USAC and Charter overlooked this notation in submitting and approving invoices with the prior FRNs.

Moreover, Charter sent the Consortium invoices throughout the 2016 Funding Year identifying the canceled FRNs, yet the Consortium did not once raise an issue during that time frame regarding Charter's reliance on those FRNs. The Consortium compounded the confusion by filing Forms 486 in connection with the canceled FRNs, certifying that it had received services under those canceled FRNs, in addition to the correct FRNs. Based on the Consortium's Form 486 filings, Charter was able to submit invoices to USAC associated with the canceled FRNs. Had the Consortium filed Forms 486 only with respect to the correct FRNs, Charter's invoices

⁶ See Request at Exhibit Three.

⁷ See FY2016 MOISD Consortium Funding Request Data for Charter Communications, Inc. (SPIN 143005817) and Charter Fiberlink CC VIII, LLC (SPIN 143033155), *available at* <https://data.usac.org/publicreports/FRN/Status/FundYear> (last checked Aug. 21, 2018), attached as Exhibit A.

submitted to USAC under the SPI method for the canceled FRNs would have been rejected, and Charter would have been prompted to file timely invoices with the replacement FRNs.

At bottom, the errors here stem from the fact that USAC funded the services and rendered payment to Charter based on invoices containing the canceled FRNs, despite otherwise acknowledging receipt of the Consortium's request to cancel the original FRNs. And when Charter subsequently made repeated inquiries regarding the status of invoices filed under the canceled FRNs, USAC reported only that the matter was "under review"⁸ and even granted an extension of the invoice deadline for submissions under the canceled FRNs,⁹ rather than directing Charter to return the funding issued pursuant to the canceled FRNs or extending the time to submit invoices based on the replacement FRNs. Although USAC staff apparently indicated to the Consortium that it would issue a letter directing Charter to return funds disbursed under the canceled FRNs,¹⁰ Charter never received such a letter. Charter itself reached out to USAC staff to resolve the issue, but did not receive any specific guidance regarding the repayment of funds or the method for seeking funding under the correct FRNs.¹¹

For the foregoing reasons, Charter did not issue any invoices to the Consortium based on the replacement FRNs, nor did it submit any invoices to USAC in connection with those FRNs. Therefore, Charter has received the appropriate amounts of funding (*i.e.*, not a duplicative

⁸ See Charter Communications, USAC Case Nos. 196063 (Sept. 19, 2017), 196075 (Sept. 19, 2017), 223889 (Feb. 16, 2018), attached as Exhibit B.

⁹ See Exhibit C (email confirmation from USAC of request by Ebony Gerdine-Hatley of Charter for extension of invoice deadline and summary of USAC updates to status).

¹⁰ See Request at Exhibit Four (Feb. 22, 2018 email from Missy Studley to Ebony Gerdine-Hatley).

¹¹ See *id* (Mar. 12, 2018 email from Ebony Gerdine-Hatley to Missy Studley).

amount), albeit under the incorrect FRNs. In turn, any funding disbursed under the canceled FRNs did not violate any Commission rules, but rather reflects an administrative error.

II. CHARTER REQUESTS THAT THE COMMISSION DIRECT USAC TO CORRECT THE ADMINISTRATIVE ERROR AND GRANT A WAIVER AS NEEDED TO FACILITATE A RESOLUTION

Charter agrees that the Consortium should not be required to reimburse amounts disbursed in connection with funding requests that were canceled. Charter has made good faith efforts to work with USAC to reimburse amounts that USAC incorrectly approved under FRNs that had previously been canceled by the Consortium. However, USAC has failed to take timely action to enable Charter to return the funding associated with canceled FRNs and obtain appropriate funding under the substitute FRNs. Unfortunately, by the time the issue had been brought to Charter's attention, the deadline for submitting invoices under the new FRNs had passed.

Charter respectfully requests that the Commission direct USAC to take steps to correct its records to credit the funding amounts paid toward the correct FRNs. Directing USAC to simply associate the correct FRNs with the funding already distributed, and to disburse any unpaid but committed amounts, would be the most administratively efficient solution to the issue at hand. Alternatively, if such corrective action is not feasible, Charter requests that the Commission grant a waiver as needed to allow an extension of deadlines for submitting invoices in connection with the correct FRNs to enable any filings necessary to effectuate the payment of funding under the correct FRNs. If the Commission determines that the administrative error can be corrected only by resubmitting the invoices under the correct FRNs, Charter requests that the Commission direct USAC to issue a demand payment letter to Charter for the amounts disbursed under the incorrect FRNs, and to issue payment to Charter of all funding originally committed under the correct FRNs.

If the Commission determines that this latter option is necessary, Charter urges the Commission to specify that USAC take action to ensure *both* payment under the correct FRN *and*

repayment of the same amounts by Charter under the incorrect FRNs. Requiring Charter to reimburse the amounts disbursed under the canceled FRNs without issuing a waiver to allow resubmission of invoices and payment of all funding committed under the correct FRNs would lead to a grossly inequitable result. Charter has already rendered services to the Consortium consistent with the requirements of the E-rate program, and if Charter is required to remit funding paid under the canceled FRNs and is unable to submit invoices and obtain funding under the correct FRNs, it would be paid only the undiscounted amount totaling 20 percent of the rates bid in the competitive bidding process. It would be manifestly unjust to penalize Charter by denying funding due to inadvertent administrative oversights, particularly when the erroneous payments could have been prevented by USAC.

CONCLUSION

For the foregoing reasons, Charter respectfully requests that the Commission direct USAC to take action to rectify the administrative errors underlying the Consortium's Request by either:

- (i) associating the funding already disbursed to Charter in connection with canceled FRNs (1699033494 and 1699033501) with the correct FRNs (1699079036 and 1699079047), or
- (ii) seeking payment of the funds disbursed under the canceled FRNs *and* approving the payment of all funding committed for the 2016 Funding Year. Charter requests that the Commission grant a waiver as necessary to extend the invoice submission deadline for the 2016 Funding Year to allow Charter to submit invoices under FRNs 1699079036 and 1699079047.

Respectfully submitted,

Michael R. Moore
Group VP Law – Telephone Regulatory
CHARTER COMMUNICATIONS, INC.
12405 Powerscourt Dr.
St. Louis, MO 63131

/s/

Matthew A. Brill
Elizabeth R. Park
LATHAM & WATKINS LLP
555 Eleventh Street, NW
Suite 1000
Washington, DC 20004

August 31, 2018

Exhibit A

FRN	FRN Nickname	FRN Status	471 Application Number	471 Nickname	471 Application Status	471 Review Status	Establishin g FCC Form 470 Number	Establishi ng FCC Form 470 Status	User Entered Establishi ng FCC Form 470 Number	BEN
1699079036	Charter-WAN	Funded	161037183	FY16-471-CON MOISD	Committed	FCDL Issued	160025646	Certified		17001958
1699033501	Charter-IA	Funded	161018359	FY16 471-CON MOISD	Committed	FCDL Issued	160025646	Certified		17001958
1699079047	Charter-IA	Funded	161037183	FY16-471-CON MOISD	Committed	FCDL Issued	160025646	Certified		17001958
1699033494	Charter-WAN	Funded	161018359	FY16 471-CON MOISD	Committed	FCDL Issued	160025646	Certified		17001958

Billed Entity Name	Applicant Type	Applicant Street Address 1	Applicant Street Address 2	Applicant City	Applicant State	Applicant Zip Code	471 Contact Name	471 Contact E-mail
MOISD Consortium	Consortium	15760 190th Ave		Big Rapids	MI	49307	Robert Rice	bob@triple-r.us
MOISD Consortium	Consortium	15760 190th Ave		Big Rapids	MI	49307	Fredric Sharpsteen	erate@moisd.org
MOISD Consortium	Consortium	15760 190th Ave		Big Rapids	MI	49307	Robert Rice	bob@triple-r.us
MOISD Consortium	Consortium	15760 190th Ave		Big Rapids	MI	49307	Fredric Sharpsteen	erate@moisd.org

BEN Urban/R ural Status	BEN Account Administrator	BEN Account Administrator Email	State LEA Code	State School Code	Library Locale Code	Library FSCS Key	Library Square Footage	Library FSCS SEQ	471 Consultan t Registrati on Number	471 Consulti ng Firm Name
Rural	Fredric Sharpsteen	erate@moisd.org								
Rural	Fredric Sharpsteen	erate@moisd.org								
Rural	Fredric Sharpsteen	erate@moisd.org								
Rural	Fredric Sharpsteen	erate@moisd.org								

Service Provider Name	SPIN	SPAC Filed?	Fund Year	486	Contract Award Date	Contract Exp or Svc End Date	Remainin	Last Date to Invoice	Orig R Monthly Cost	Cmtd R Monthly Cost
				Service Start Date			g Contract Extension s			
Charter Fiberlink CC VIII, LLC	143033155	Yes	2016	7/1/2016	5/2/2016	6/30/2021		10/30/2017	\$5,879.68	\$5,879.68
Charter Communications	143005817	Yes	2016	7/1/2016	3/15/2016	6/30/2021		2/27/2018	\$2,205.00	\$0.00
Charter Communications	143005817	Yes	2016	7/1/2016	3/15/2016	6/30/2021		10/30/2017	\$2,205.00	\$2,205.00
Charter Fiberlink CC VIII, LLC	143033155	Yes	2016	7/1/2016	3/11/2016	6/30/2019		2/27/2018	\$5,879.68	\$0.00

Orig R Ineligible Cost	Cmtd R Ineligible Cost	Orig R Eligible Cost	Cmtd R Eligible Cost	Orig R Months of Service	Cmtd R Months of Service	Orig R Annual Cost	Cmtd R Annual Cost	Orig NR Cost	Cmtd NR Cost	Orig NR Ineligible Cost	Cmtd NR Ineligible Cost	Orig NR Eligible Cost
\$0.00	\$0.00	\$5,879.68	\$5,879.68	12	12	\$70,556.16	\$70,556.16	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
\$22.05	\$0.00	\$2,182.95	\$0.00	12	12	\$26,195.40	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
\$22.05	\$22.05	\$2,182.95	\$2,182.95	12	12	\$26,195.40	\$26,195.40	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
\$0.00	\$0.00	\$5,879.68	\$0.00	12	12	\$70,556.16	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Cmtd NR Eligible Cost	Orig Total Cost	Cmtd Total Cost	Orig Discount	Cmtd Discount	Orig Funding Request	Cmtd Funding Request	Orig FRN Service Type
\$0.00	\$70,556.16	\$70,556.16	80%	80%	\$56,444.93	\$56,444.93	Data Transmission and/or Internet Access
\$0.00	\$26,195.40	\$0.00	80%	80%	\$20,956.32	\$0.00	Data Transmission and/or Internet Access
\$0.00	\$26,195.40	\$26,195.40	80%	80%	\$20,956.32	\$20,956.32	Data Transmission and/or Internet Access
\$0.00	\$70,556.16	\$0.00	80%	80%	\$56,444.93	\$0.00	Data Transmission and/or Internet Access

Cmtd FRN Service Type	Orig 471 SSD	Cmtd 471 SSD	Wave Number	FCDL Date	Date User Generated FCDL
Data Transmission and/or Internet Access	7/1/2016	7/1/2016	24	12/5/2016	12/5/2016
Data Transmission and/or Internet Access	7/1/2016	7/1/2016	19	10/31/2016	11/1/2016
Data Transmission and/or Internet Access	7/1/2016	7/1/2016	24	12/5/2016	12/5/2016
Data Transmission and/or Internet Access	7/1/2016	7/1/2016	19	10/31/2016	11/1/2016

FCDL Comment for 471 Application

MR1:FRN(s) modified in accordance with a RAL request. Modified main contact on application per RAL request. || MR2:The applicant did not submit any R,
CR1:FCC Form 471 application 161018359 was canceled in accordance with a RAL request submitted by Robert Rice received on 5/3/2016 2:45 PM EDT.
MR1:FRN(s) modified in accordance with a RAL request. Modified main contact on application per RAL request. || MR2:The applicant did not submit any R,
CR1:FCC Form 471 application 161018359 was canceled in accordance with a RAL request submitted by Robert Rice received on 5/3/2016 2:45 PM EDT.

FCDL Comment for FRN

MR1:Approved as submitted.

CR1:FCC Form 471 application 161018359 was canceled in accordance with a RAL request submitted by Robert Rice received on 5/3/2016 2:45 PM EDT.

MR1:The FRN was modified from NO to YES as a direct connection directly to agree with the applicant response to CCT.

CR1:FCC Form 471 application 161018359 was canceled in accordance with a RAL request submitted by Robert Rice received on 5/3/2016 2:45 PM EDT.

PC Wave Number	Revised FCDL Date	Post Commit ment Rational e	RFCDL Comment	FRN Committed Amount	Invoicing Mode	Total Authorized Disburseme nt
				\$56,444.93	NOT SET	
				\$0.00	SPI	\$17,463.60
				\$20,956.32	NOT SET	
				\$0.00	SPI	\$40,317.60

Exhibit B

[Records](#) / [Customer Service Cases](#)

#196063 - SLD# 2663750 and SLD 2663758 - Status Inquiry

Summary

News

Related Actions

Case Details

Topic	FCC Form 474 - SPI - Status Inquiry	Form Type	FCC Form 474
Status	Closed	Form Number	
Priority	Medium	Created By	Ebony Gerdine-Hatley
Inquiry Type	Web	Created On	9/19/2017 9:16 AM CDT
		Organization	Charter Communications

Case Description

Description MOISD Consortium (17001958)
FRN 1699033501 - May Invoiced 6/7/17
FRN 1699033501 - June Invoiced 7/20/17
Can you please provide an update?

Case Artifacts

Documents

Name	Uploaded By	Upload Date
No items available		

Attachments

Attachment	Attachment Type
No items available	

Case Thread

User	Note	Date
USAC	<p>Ebony,</p> <p>Invoice #2600751 and #2637871 are in review for program compliance. If any additional information is necessary to complete the review, we will reach out to the contact person on the invoice. Unfortunately, we cannot provide an estimated time for the review to be completed.</p> <p>If you have any additional questions or concerns, you may reopen the case and add a note. If the case cannot be reopened, please create a new customer service case or contact the Client Service Bureau at 888-203-8100.</p>	9/19/2017 9:20 AM CDT

Case Contact

Case Contact Ebony Gerdine-Hatley

[Records](#) / [Customer Service Cases](#)

#196075 - SLD # 2601756 and SLD 2638473 - Invoice Inquiry

Summary

News

Related Actions

Case Details

Topic	FCC Form 474 - SPI - Status Inquiry	Form Type	FCC Form 474
Status	Closed	Form Number	
Priority	Medium	Created By	Ebony Gerdine-Hatley
Inquiry Type	Web	Created On	9/19/2017 9:32 AM CDT
		Organization	Charter Communications

Case Description

Description MOISD Consortium (17001958)
FRN 1699033494
SLD# 2601756 invoiced 6/5/17 and SLD# 2638473 Invoiced 7/21/17, Can you please provide an update?

Case Artifacts

Documents

Name	Uploaded By	Upload Date
No items available		

Attachments

Attachment	Attachment Type
No items available	

Case Thread

User	Note	Date
USAC	<p>Ebony,</p> <p>Invoice #2601756 and #2638473 are undergoing review for program compliance. If any additional information is necessary to complete the review, we will reach out to the contact person on the invoice. Unfortunately, we cannot provide an estimated time for the review to be completed.</p> <p>If you have any additional questions or concerns, you may reopen the case and add a note. If the case cannot be reopened, please create a new customer service case or contact the Client Service Bureau at 888-203-8100.</p>	9/19/2017 9:37 AM CDT

Case Contact

Case Contact Ebony Gerdine-Hatley

#223889 - MOISD Consortium (17001958) May and June Invoices

Summary

News

Related Actions

Case Details

Topic	FCC Form 474 - SPI - Status Inquiry	Form Type	FCC Form 471
Status	Closed	Form Number	2601756, 2638473, 2663750, 2663758
Priority	High	Created By	Ebony Gerdine-Hatley
Inquiry Type	Web	Created On	2/16/2018 4:52 PM CST
		Organization	Charter Communications

Case Description

Description

Good day,

I'm checking the status of MOISD Consortium (17001958) - FRN1699033494 - May Invoice 2601756 - June Invoice 2638473. As well as, FRN1699033501 - May Invoice 2663750 and June invoice 2663758. Can you please provide me and update for these invoices.

Case Artifacts

Documents

Name	Uploaded By	Upload Date
No items available		

Attachments

Attachment	Attachment Type
No items available	

Case Thread

User	Note	Date
USAC	<div>Ebony,</div> <div>All 4 of these Invoices for App 161018359 are still in the review process. If additional information is needed, the SP/Applicant will be contacted. Unfortunately we do not have an estimated completion date available at this time.</div> <div>If you have any additional questions or concerns, you may reopen the case and add a note. If the case cannot be reopened, please create a new customer service case or contact the Client Service Bureau at 888-203-8100.</div>	2/21/2018 8:44 AM CST
USAC	<div>Ebony,</div> <div>Your inquiry has been received. In order to provide you with a thorough and accurate response, we are currently researching your inquiries. We will provide a response as soon as we have more information.</div> <div>Thank you.</div>	2/19/2018 12:05 PM CST

Case Contact

Case Contact

Ebony Gerdine-Hatley

Exhibit C

From: sldnoreply@sl.universalservice.org
Sent: Monday, October 09, 2017 11:43 AM
To: Gerdine-Hatley, Ebony
Subject: SLD Inquiry #: 22-953400 Received

Thank you for using Submit a Question. This message serves as a receipt confirmation of your submission.

The case number for your submission is 22-953400.

Please refer to this case number in subsequent contacts regarding this issue. Note that we may need to ask you for additional information to completely answer your question or fulfill your request.

If you still have questions about this issue after you review our response, please call us at 1-888-203-8100. Please do not reply to this message or to our response, as replies go to an unattended mailbox.

If you have a new question or issue, please submit another question and we will create a new case number to address it.

If you need program information, you can visit the SLD web site at www.usac.org/sl.

Thank you.

Following is the information you submitted:

*[FirstName]=Ebony [LastName]=Gerdine-Hatley [JobTitle]=SB Government Subsidized Program Specialist
[EmailAddress]=ebony.gerdine@charter.com [WorkPhone]=3148583553 [FaxPhone]=3148583553
[PreviousCaseNumber]=0 [FormType]=Invoice Extension [Owner]=DEADLINEEXTENSIONS
[DateSubmitted]=10/9/2017 11:37:50 AM [AttachmentFlag]=N[Question2]=Invoice Extension Request For:
MOISD Consortium (17001958) FCC Form 471 #: 161018359 FRN: 1699033501 and 1699033494 Hello, Due
to the lengthy review process, we would like to request an invoice extension for the school and FRN(s) listed
above as there are payments still pending from USAC that have not been tendered. Also, extensive time is
needed to access the requested information for USAC Reviewers from our customers.*

Date*	Event
03/30/2018	FRN 1699033494 removed from FRN Extension table
03/28/2018	Changes to FRN 1699033494 - Committed Amount changed from '\$56,444.93' to '\$0.00' - Rejected Amount changed from '0.00' to '56444.93'
02/25/2018	Changes to FRN 1699033494 - Last Date to Invoice changed from '02/26/2018' to '02/27/2018'
02/24/2018	Changes to FRN 1699033494 Extension - Last Allowable Date for an Invoice changed to '02/27/2018'
11/11/2017	Changes to FRN 1699033494 - Last Date to Invoice changed from '10/30/2017' to '02/26/2018'
11/11/2017	FRN 1699033494 added to FRN Extension table
05/09/2017	Changes to FRN 1699033494 - Authorized Disbursement Amount changed from '\$36,285.84' to '\$40,317.60'
04/14/2017	Changes to FRN 1699033494 - Authorized Disbursement Amount changed from '\$32,254.08' to '\$36,285.84'
03/14/2017	Changes to FRN 1699033494 - Authorized Disbursement Amount changed from '\$28,222.32' to '\$32,254.08'
02/19/2017	Changes to FRN 1699033494 - Status Text changed from 'CR1:FCC Form 471 application 161018359 was canceled in accordance with a RAL request submitted by Robert Rice received on 5/3/2016 2:45 PM EDT.' to 'CR1:FCC Form 471 application 161018359 was canceled in accordance with a RAL request submitted by Robert Rice received on 5/3/2016 2:45 PM EDT.' CR1:FCC Form 471 application 161018359 was canceled in accordance with a RAL request submitted by Robert Rice received on 5/3/2016 2:45 PM EDT.'
02/14/2017	Changes to FRN 1699033494 - Authorized Disbursement Amount changed from '\$24,190.56' to '\$28,222.32'
01/13/2017	Changes to FRN 1699033494 - Authorized Disbursement Amount changed from '\$16,127.04' to '\$24,190.56' - Last Date to Invoice changed from '10/28/2017' to '10/30/2017'
11/11/2016	Changes to FRN 1699033494 - Status Text changed from ' to 'CR1:FCC Form 471 application 161018359 was canceled in accordance with a RAL request submitted by Robert Rice received on 5/3/2016 2:45 PM EDT.' - Payment Method changed from 'NOT SET' to 'SPI' - Authorized Disbursement Amount changed from '\$0.00' to '\$16,127.04'
11/05/2016	Changes to FRN 1699033494 - Status Text changed from 'CR1:FCC Form 471 application 161018359 was canceled in accordance with a RAL request submitted by Robert Rice received on 5/3/2016 2:45 PM EDT.' to ' - Last Date to Invoice changed from ' to '10/28/2017'
11/03/2016	Changes to FRN 1699033494 - Status Text changed from ' to 'CR1:FCC Form 471 application 161018359 was canceled in accordance with a RAL request submitted by Robert Rice received on 5/3/2016 2:45 PM EDT.' - FCDL Date changed from ' to '10/31/2016' - Wave Number changed from ' to '19'

Date*	Event
03/30/2018	FRN 1699033501 removed from FRN Extension table
03/28/2018	Changes to FRN 1699033501 - Committed Amount changed from '\$20,956.32' to '\$0.00' - Rejected Amount changed from '0.00' to '20956.32'
02/25/2018	Changes to FRN 1699033501 - Last Date to Invoice changed from '02/26/2018' to '02/27/2018'
02/24/2018	Changes to FRN 1699033501 Extension - Last Allowable Date for an Invoice changed to '02/27/2018'
11/11/2017	Changes to FRN 1699033501 - Last Date to Invoice changed from '10/30/2017' to '02/26/2018'
11/11/2017	FRN 1699033501 added to FRN Extension table
05/09/2017	Changes to FRN 1699033501 - Authorized Disbursement Amount changed from '\$15,717.24' to '\$17,463.60'
04/14/2017	Changes to FRN 1699033501 - Authorized Disbursement Amount changed from '\$13,970.88' to '\$15,717.24'
03/14/2017	Changes to FRN 1699033501 - Authorized Disbursement Amount changed from '\$12,224.52' to '\$13,970.88'
02/19/2017	Changes to FRN 1699033501 - Status Text changed from 'CR1:FCC Form 471 application 161018359 was canceled in accordance with a RAL request submitted by Robert Rice received on 5/3/2016 2:45 PM EDT.' to 'CR1:FCC Form 471 application 161018359 was canceled in accordance with a RAL request submitted by Robert Rice received on 5/3/2016 2:45 PM EDT.' CR1:FCC Form 471 application 161018359 was canceled in accordance with a RAL request submitted by Robert Rice received on 5/3/2016 2:45 PM EDT.'
02/07/2017	Changes to FRN 1699033501 - Authorized Disbursement Amount changed from '\$10,478.16' to '\$12,224.52'
01/13/2017	Changes to FRN 1699033501 - Authorized Disbursement Amount changed from '\$8,731.80' to '\$10,478.16' - Last Date to Invoice changed from '10/28/2017' to '10/30/2017'
12/16/2016	Changes to FRN 1699033501 - Payment Method changed from 'NOT SET' to 'SPI' - Authorized Disbursement Amount changed from '\$0.00' to '\$8,731.80'
11/11/2016	Changes to FRN 1699033501 - Status Text changed from " to 'CR1:FCC Form 471 application 161018359 was canceled in accordance with a RAL request submitted by Robert Rice received on 5/3/2016 2:45 PM EDT.'
11/05/2016	Changes to FRN 1699033501 - Status Text changed from 'CR1:FCC Form 471 application 161018359 was canceled in accordance with a RAL request submitted by Robert Rice received on 5/3/2016 2:45 PM EDT.' to " - Last Date to Invoice changed from " to '10/28/2017'
11/03/2016	Changes to FRN 1699033501 - Status Text changed from " to 'CR1:FCC Form 471 application 161018359 was canceled in accordance with a RAL request submitted by Robert Rice received on 5/3/2016 2:45 PM EDT.' - FCDL Date changed from " to '10/31/2016' - Wave Number changed from " to '19' - Form 486 Service Start Date changed from " to '07/01/2016'

CERTIFICATE OF SERVICE

I, Elizabeth R. Park, hereby certify that on August 31, 2018, I caused the foregoing Response to Request for Review to be served via electronic mail upon the following:

Universal Service Administrative Co.
Schools and Libraries Program
Attn: Letter of Appeal
700 12th Street, NW, Suite 900
Washington, DC 20005
Appeals@sl.universalservice.org

Lee G. Petro
Pillsbury Winthrop Shaw Pittman LLC
1200 Seventeenth Street, NW
Washington, DC 20005-1209
[Lee.Petro@Pillsbury Law.com](mailto:Lee.Petro@PillsburyLaw.com)

Counsel to the MOISD Consortium

Kris Monteith, Chief
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
Kris.Monteith@fcc.gov

Katherine Dumouchel, Acting Division Chief
Telecommunications Access Policy Division
Wireline Competition Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554
Katherine.Dumouchel@fcc.gov

/s/

Elizabeth R. Park